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Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Amendment of Part 95 of the ) WT Docket 95-102  
Commission's Rules to )  
Establish a Very Short Distance )  
Two-Way Voice Radio Service )

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Comments to a Notice of Proposed Rule Making

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GMRS Callsign KAF-3631  
Signature Alton G. Silver  
Date September 26, 1995

My name is Alton Silver, and I am writing to you concerning the proposed rule making decision to allow the Establishment of a Very Short Distance Two-Way Voice Radio Service known as the Family Radio Service (FRS). I am a GMRS user (KAF-3631) on a GMRS system along with three other families. This GMRS system consists of a repeater station, and I am very concerned about how this decision will affect the future operation of this repeater station. In my opinion, the GMRS is already a family radio service which allows short range communications between individuals and family members, and also longer range repeater assisted communications for individuals and family members. The approval of the FRS would only compromise the many advantages that the GMRS has to offer to future family users.

One major advantage of the GMRS is the licensing process. This process does not allow businesses to use the spectrum, it allows only individuals and families the use of it. If the licensing process is lost (which is proposed by the FRS) then businesses will once again overtake the spectrum causing interference to family users. Without the licensing process it would be impossible to track interference problems because there would be no records of who might be causing the interference. Requiring no licenses, would also open up the service to undisciplined and uncontrollable users.

In my own experience, I have seen the decay of the Citizens Band Radio Service (27 MHz) since it was delicensed in the late

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1970's. Today the Citizens Band Radio Service is ruled by foul mouthed individuals who hide behind their microphones. I would describe their language and sexual vulgarness as something that might put an X-rated movie to shame. These shameless operators use illegal amplifying devises (know as liners) to increase the RF power output well above the legal limit (CB legal limit 4 watts on AM transmissions) making it possible to here them well beyond normal communications range causing severe interference to other users. It is not uncommon for these operators to also bleed on home and business telephones and electronic systems while they are being used. It has also been my experience to learn that these operators can leave the CB band due to modifications made illegally to their CB radios. These modifications allow the CB radio to go below and above the CB band, well into the 10 meter ham band (it would be impossible to imagine the consequences if this happened in the UHF band). Allowing the unlicensed FRS to be approved would open the door for this kind of abuse on the same radio spectrum that is used by the GMRS.

Another reason for concern involves the fourteen interstitial channels proposed by the FRS. There are seven interstitial channels on the 462 MHz portion and seven on the 467 MHz portion. An Interstitial channel is a channel which is situated within itself but not restricted to itself. In other words, an interstitial channel overlaps the two primary channels adjacent to that interstitial channel. My concern is that GMRS repeaters receive on the 467 MHz primary channels. The FRS also wants to allow subaudible tones for select calling of other FRS transceivers. The combination of the 467 MHz interstitial channels along with the subaudible tones is extremely alarming. In my own experience, I have found that if transmissions are made on the interstitial channel next to the primary channel a repeater uses for receiving, that repeater will be subjected to unacceptable interference. If these transmissions also have the same subaudible tone that the repeater listens for, it will also cause the unlawful activation of that repeater. The current GMRS rules do not allow the use of the 467 MHz interstitial channels because it would cause these unacceptable conditions to occur. The FRS would severely compromise the advantage of repeater assisted communications allowed under the GMRS, and the FRS users would not even be aware of the interference they would be causing, even if the interference happened to be emergency communications.

If the FCC really wishes to help personal and family communications, it should not allow the approval of the FRS but make the licensing process for the GMRS less cumbersome. This would encourage more family users to enjoy the many advantages the GMRS has to offer them versus the FRS. If there must be a FRS it should not be mixed with a licensed service, but have a portion of spectrum all its own on higher frequencies than that used by the GMRS. The use of higher frequencies would allow

better building penetration, and a truly short range communication service as that which is proposed by the FRS. If the FCC approves the FRS on the spectrum used by the GMRS, it will show me its true intentions of how it wants to disrupt personal and family communications beyond the point of restoration. I demand that the FCC protect the future of the GMRS from the problems that will arise from the FRS. The proper way for the FCC to protect the spectrum allotted to the GMRS is to allow the spectrum to be used exclusively by the GMRS as a licensed radio service for personal and family communications and to forbid the use of the 467 MHz interstitial channels or any of the 467 MHz spectrum by the FRS.